

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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(Admitted *pro hac vice*)
PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

January 11, 2022 at 10:00 a.m.

**NOTICE OF DEBTOR'S MOTION FOR AN ORDER APPOINTING JOSEPH W.
GRIER, III AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

PLEASE TAKE NOTICE that, on January 11, 2022 at 10:00 a.m., or as soon thereafter as counsel may be heard, LTL Management LLC, the above-captioned debtor (the "Debtor"), by and through its proposed counsel, shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, Clarkson S.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of an order appointing Joseph W. Grier, III as legal representative for future talc claimants (the "Motion").

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, the Debtor will rely upon the certification of John K. Kim, the declaration of Joseph W. Grier, and the memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, Clarkson S. Fisher Courthouse, 402 East State Street, Trenton, New Jersey 08608, and served upon (a) the Debtor's undersigned counsel, (b) the proposed counsel to the Official Committee of Talc Claimants, (c) the proposed Future Claimants' Representative and his counsel, and (d) any other party entitled to notice no later than seven (7) days prior to the hearing.

PLEASE TAKE FURTHER NOTICE that, unless an objection is timely filed and served, the Motion will be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

Dated: December 6, 2021

WOLLMUTH MAHER & DEUTSCH LLP

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